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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

JOHN K. BALDWIN,

Plaintiff,

vs.

UNITED STATES OF AMERICA,

Defendant.

Case No.: CV08-0024

**STIPULATION FOR EXTENSION
OF TIME**

WHEREAS, on May 30, 2008, Plaintiff, John K. Baldwin, filed his Original Complaint and Application for Injunctive Relief along with an Emergency Motion for Temporary Restraining Order;

1 WHEREAS, the United States of America's response to the original Complaint is due on
2 July 29, 2008;

3 WHEREAS, due to the complexity of the case, the United States requests additional time
4 to respond to the Original Complaint;

5 WHEREAS, the parties agree that, in light of the substantive nature of the case, an Order
6 Granting Extension of Time which grants the United States sixty (60) days from July 29, 2008 to
7 file its response is appropriate;

8 NOW, THEREFORE, in light of the foregoing recitals, the parties, through their
9 respective undersigned counsel, stipulate to continue the case and jointly request the Court to
10 enter an Order Granting Extension of Time.

11 SO STIPULATED: this 25th day of July, 2008.

12 O'CONNOR BERMAN DOTTS & BANES

13 /s/ Gregory J. Koebel
14 GREGORY J. KOEBEL
15 ROBERT J. O'CONNOR
Attorneys for Plaintiff

16 SO STIPULATED: this 25th day of July, 2008.

17 JEREMY HENDON
18 Trial Attorney, Tax Division
U.S. Department of Justice

19 LEONARDO M. RAPADAS
20 United States Attorney
Districts of Guam & NMI

21 /s/ Jessica F. Cruz
22 JESSICA F. CRUZ
23 Assistant U.S. Attorney
MIKEL W. SCHWAB
24 Assistant U.S. Attorney
Attorneys for the Defendant